

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**JERRY and ASHLEY JACKSON,
Individually and o/b/o JOHN DOE,
a minor,
Plaintiffs**

vs.

**SUMNER COUNTY BOARD OF
EDUCATION and DONNA
WEIDENBENNER, Individually and in her
official capacity as the Special Needs Teacher
of Station Camp Elementary School,
Defendants**

**CIVIL ACTION NO. 3:09-CV-1005
Judge Wiseman
Magistrate Griffin**

JURY DEMAND

PROTECTIVE ORDER

The Tennessee Department of Children's Services ("DCS") will search for records relevant to this proceeding. Any records that DCS produces in accordance with Tennessee law are hereby agreed to be **confidential** under Tenn. Code Ann. §§ 37-1-409, 37-1-612 and 37-5-107, and **DCS shall produce and deliver a copy to the defendants' attorneys of record, Amber St. John and Mac E. Robinson, Jr., as soon as possible. Disclosure or publication** of any information derived from the documents produced shall be limited to the parties and their counsel and to such other personnel employed by the parties in the litigation of the above-styled case. Notwithstanding this order, DCS legal files that are privileged attorney-client communications or attorney work product shall remain confidential and are not subject to disclosure.

Any proper person to whom any information identified in paragraph 1 is disclosed under the terms of this agreement shall be **provided a copy of this order** and is directed not to reveal the

contents thereof for any purpose other than as permitted in this order or a subsequent order of this Court.

The **use of any information** identified in paragraph 1 for any purpose other than the preparation and trial of the above case or other proceedings related to this litigation is prohibited, except as allowed by statute or modified by subsequent order of this Court.

1. The name and other identifying information of any reporter of harm, abuse or neglect, as well as the name and other identifying information of any child or family receiving services from DCS, other than those of the child or children at issue, shall be **redacted** from the records.

2. The defendants shall be allowed to **depone** Mindy Guy, DCS Investigator, subject to this Protective Order.

3. **At the conclusion of this matter**, all outstanding copies of confidential DCS records shall be destroyed; any outstanding originals will be returned to DCS.

It is so **ORDERED**.


JULIET GRIFFIN
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via the Court's electronic filing system to: **Andy L. Allman, F. Dulin Kelly** and **Clinton L. Kelly**, Attorneys for Plaintiffs, KELLY, KELLY & ALLMAN, 629 East Main Street, Hendersonville, TN 37075-2606, **Amber St. John**, Attorney for Sumner Co Board of Education, Suite 103, 1197 Hazelwood Drive, Smyrna, TN 37167, and to **Douglas E. Dimond, Sr.**, Tennessee Attorney General's Office, 425 5th Ave. N., PO Box 20207, Nashville, TN 37202 on this 8th day of November, 2010.

S/Mac E. Robinson, Jr.